

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**Janice Hughes Barnes, Individually and §
as a Representative of The Estate of §
Ashtian Barnes, Deceased; and Tommy §
Duane Barnes §
Plaintiffs §**

VS.

**Roberto Felix, Jr. §
And the County of Harris, Texas §
Defendants. §**

C.A. NO.: 4:18-CV-00725

PLAINTIFF'S MOTION TO LIFT STAY OF TRIAL DEADLINES

COMES NOW Plaintiff, Janice Hughes Barnes, Individually and as a Representative of The Estate of Ashtian Barnes, Deceased, and respectfully request this Court lift the Stay with respect to the trial date in this matter and would show the following:

On October 1, 2019, this court ordered a stay of the trial deadlines in the case, pending a ruling on the Motion for Summary Judgment filed by Defendants. Specifically, the court stayed deadline 5a, 5b, 6, and 7 of the First Amended Scheduling Order. Now that the court has made its ruling on Defendants Motion for Summary Judgment, Plaintiff, Janice Hughes Barnes, respectfully requests that this court lift the current stay of the related trial deadlines, and that this court reset those deadlines for a future date and for any other such relief Plaintiffs are entitled

Date: February 14, 2022

Respectfully Submitted,

Respectfully Submitted,

/s/Mimi Marziani

Mimi Marziani

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on each attorney of record electronically on this 3rd day of March 2022.

/s/ Adam Fomby
Adam Fomby

CERTIFICATE OF CONFERENCE

I certify that on or about March 3, 2022 I attempted to contact opposing counsel regarding this Motion by phone, and was not able to reach counsel to determine if he was opposed or unopposed.

/s/ Adam Fomby
Adam Fomby